

## **Exhibit 24**

Rose Klala  
Volume II

HIGHLY CONFIDENTIAL  
Reston, VA

July 10, 2003

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF OHIO  
3 WESTERN DIVISION  
4 - - - - - x  
5 THE PROCTER & GAMBLE COMPANY, : HIGHLY  
6 Plaintiff, : CONFIDENTIAL  
7 v. :  
8 THE COCA-COLA COMPANY, :  
9 Defendant. : Civil Action No.  
: C-1-02-393  
: Volume II of II  
: taken on 7/10/03  
:

10 - - - - - x  
11 July 10, 2003  
12 Reston, Virginia

13 CONTINUED VIDEOTAPED DEPOSITION OF:

14 ROSE KALALA

15 a Witness in the above-entitled cause, called  
16 for examination by counsel for the Plaintiff,  
17 pursuant to notice and to agreement of counsel as to  
18 time and place, at the law offices of Hale and Dorr,  
19 LLP, 11951 Freedom Drive, Reston, Virginia,  
20 commencing at 10:39 a.m., before Marney Alena  
21 Mederos, RPR, a Notary Public in and for the  
22 Commonwealth of Virginia, when were present on

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## 1 C O N T E N T S

2 WITNESS: EXAMINATION BY: PAGE:

3 Rose Kalala Ms. Ferrera 6

4

5

6

## 7 E X H I B I T S

8 NO. DESCRIPTION PAGE:

9 1 1/30/1990 memorandum to Ms. Kalala and 32  
10 others from Mr. Lee

11

12 2 Notice of Deposition 50

13

14 3 Notice of Deposition 50

15

16 4 6/27/1984 memorandum to Dr. Clark 71  
17 from Dr. Varsel

18

19 5 R&amp;D Progress Report, January 1985 95

20

21 6 11/1/1985 memorandum to Ms. Kalala 114  
22 from Mr. Maculan

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1	E X H I B I T S (CONTINUED)		
2	NO.	DESCRIPTION	PAGE:
3	7	10/18/1985 memorandum to Mr. De Leon	130
4		from Ms. Kalala	
5			
6	8	10/18/1985 memorandum to Dr. Clark	136
7		from A. Puri	
8			
9	8A	Product Evaluation Group Test/Study	142
10		Report	
11			
12	8B	10/9/1985 memorandum to File from	147
13		Ms. Kalala	
14			
15	9	Attribute Differences	136
16			
17	Note:	Exhibits 1 through 3 were marked in	
18		Volume I of Ms. Kalala's deposition	
19		taken on July 10, 2003.	
20			
21	CONFIDENTIAL SESSION: PAGES 1-66		
22	HIGHLY CONFIDENTIAL SESSION: PAGES 67-159		

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1 paragraph states, the use of calcium lactate or  
2 gluconate might be considered as a calcium source.

3 Do you see that?

4 Or Ca+2 source, actually.

5 Do you see that?

6 A Yes.

7 Q Do you know why Dr. Varsel suggested  
8 the use of calcium lactate or gluconate at that  
9 time?

10 A I really don't know why he suggested  
11 it.

12 Q This memo is dated June 27th, 1984.

13 Is that about the time that you were  
14 assigned the project to identify a calcium source  
15 that could be used to fortify frozen concentrated  
16 orange juice?

17 A Yes. I believe it was.

18 Q Okay. When did Coca-Cola first begin  
19 to sell a calcium-fortified product?

20 A Coca-Cola Foods began to market in a  
21 regional market calcium-fortified juice in September  
22 of 1986.

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1 Q Okay. And what was the regional market  
2 in which that product was first sold or marketed?

3 A I -- I can't remember that one.

4 Q Okay. How much time passed in between  
5 your first becoming assigned this project and the --  
6 well, strike that.

7 The product that Coca-Cola began to  
8 market in September 1986, did that product have a  
9 name?

10 A Do you mean what -- what was the name  
11 of the product?

12 Q Yes.

13 A I'm not going to be able to tell you  
14 the exact words that are on the label, but it was  
15 Minute Maid Orange Juice Calcium Fortified or it  
16 could have been called Minute Maid Calcium-Fortified  
17 Orange Juice.

18 Q Okay. And was that product a chilled  
19 product or frozen concentrate?

20 A It was chilled.

21 Q At some point, did Minute Maid or  
22 Coca-Cola begin to offer a calcium-fortified frozen